

Industrial General Storm Water Permit Compliance Efforts by the Los Angeles Region

Background:

On July 1, 2015 the State Water Board adopted the new General Permit for Storm Water Discharges Associated with Industrial Activities, [Order No. 2014-0057-DWQ](#) (known as the Industrial General Permit or IGP). This permit contains several new reporting requirements and as a result, the Regional Water Boards had to identify and address issues including facilities that failed to re-enroll under the new IGP, enrollees that failed to sample and report the quality of their storm water runoff, and facilities that failed to update their No Exposure Certification (NEC) status. These requirements put a strain on the already constraint resources at the Los Angeles Regional Water Board. To address these issues, the Regional Water Board implemented a strategy that utilizes existing technologies to determine compliance with the IGP.

Re-enrollment in the IGP is a significant challenge for the Los Angeles Regional Water Board. After the new IGP became effective, enrollees in the old IGP were required to re-enroll by August 14, 2015. Industrial facilities that failed to re-enroll by the deadline would become non-enrollees subject to mandatory penalties. Another challenge for the Regional Water Board is the lack of sampling data in enrollee annual reports. Facilities have claimed, at times for several years, that the lack of a qualifying rain event(s) was the reason they failed to collect and report water quality data as required by the IGP. In addition, when facilities fail to update their NEC the Regional Water Board cannot determine if a facility may currently have exposure of industrial activities to storm water and if the appropriate best management practices (BMPs) are in place.

Summary of Project:

To address the issue of re-enrollment into the new IGP, Los Angeles Regional Water Board staff updated the information and public interface of the Regional Water Board's website to be more user-friendly, and used the State's Storm Water Multiple Application and Report Tracking System ([SMARTS](#)) database in their effort to conduct extensive outreach to all enrollees. These efforts successfully resulted in a 95% re-enrollment rate. Also, staff reached out to industrial facilities that had obtained a NEC under the previous IGP, resulting in the successful re-certification of every facility covered by an NEC. Despite the July 15th annual reporting deadline, compliance with submitting the reports has historically been poor. However, the implementation of the Region's updated and enhanced outreach plan has resulted in a significant increase of report submittals. The previous three fiscal years (FY 2013-2014 to 2015-2016) had submittal rates above 90% as a result of these new outreach efforts. The annual report submittal for this fiscal year (FY 2016-2017) is at 94%. To measure the effectiveness of these efforts, a pilot project has been designed that involves extensive work with Geographical Information System (GIS) maps, SMARTS, and other databases to define a watershed, to locate permitted and unpermitted sites and storm drains, to develop an inspection and sampling strategy, and to track and report results. The databases we used include SMARTS, the Los Angeles County Flood Control District's databases to

determine the outfalls, and a Microsoft Access database created by Regional Water Board staff to track inspections.

In addition, Los Angeles Regional Water Board staff implemented a technology-driven methodology to monitor compliance and take follow-up enforcement action for facilities not in compliance with the sampling requirements in the IGP. Regional Water Board staff used data sets that included local rain gauge data and storm water sampling data from industrial sites in the vicinity of facilities that failed to collect storm water data. The data sets were merged on a GIS map and turned into an efficient tool to verify or refute a facilities claim that there was insufficient rain for them to collect storm water samples.